

League of Women Voters of Arizona, et al.

v.

**Michele Reagan, in her official capacity as
Secretary of State for the State of Arizona**

Exhibit Index to Reply in Support of Plaintiffs'
Motion for Preliminary Injunction

<u>Exhibit No.</u>	<u>Description</u>
A	Declaration of Paul Wade dated September 5, 2018
B	Declaration of Khalil Rushdan dated September 5, 2018

EXHIBIT A

DECLARATION OF PAUL WADE

(Pursuant to 28 U.S.C. § 1746)

I, Paul Wade, declare as follows,

1. I am over the age of 18, have been a resident of Arizona since birth, make this declaration from my personal knowledge and, if called upon to do so, could competently testify to the matters set forth in this declaration in a court of law.
2. I am a high school history teacher at a public charter school in Phoenix, Arizona.
3. In March 2018 I purchased a new home in Arizona.
4. At the time that I moved I used the Service Arizona website to report my change of address for my driver's license to the Arizona Motor Vehicle Division. I assumed that doing so would mean that my voter registration address would be automatically updated.
5. Shortly thereafter I attended a legislative district meeting for the district that covers my new address. While there I donated five dollars to a candidate attempting to qualify for Clean Elections.
6. After the event, on April 10, 2018, the candidate's daughter, who had access to the voter registration database, looked up my record and discovered that I was still registered to vote at my old address.
7. Had I not been at the meeting and subsequently contacted by the campaign I would not have realized my address was not correct until I tried to vote in the primary election.
8. As soon as I discovered my voter registration address had not been updated I again accessed the Service Arizona website and entered the same information I had previously entered in order to request that my voter registration address be updated.
9. I am a member of the League of Women Voters of Arizona.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 5, 2018.



EXHIBIT B

DECLARATION OF KHALIL RUSHDAN

(Pursuant to 28 U.S.C. § 1746)

I, Khalil Rushdan, declare as follows,

1. I am over the age of 18, have been a resident of Arizona since 2013, make this declaration from my personal knowledge and, if called upon to do so, could competently testify to the matters set forth in this declaration in a court of law.
2. In 1997 I was wrongfully convicted of murder. In 2012 my conviction was overturned and I was freed after serving 15 years of a life sentence.
3. In 2013, after my voting rights had been restored, I registered to vote for the first time. I registered using my residential address in Glendale, Arizona.
4. In 2018, I visited the Arizona Department of Motor Vehicles (“MVD”) to add a hazmat endorsement to my commercial driver’s license. As a part of that application I provided MVD with my new residential address in Goodyear, Arizona. Because the address on my license was updated, I assumed that by providing my new residential address to MVD that my voter registration address would automatically be updated.
5. On August 28, 2018 I planned to vote in the primary election. I was very excited because it was the very first time I was going to vote. One of my colleagues, who has access to the VAN voter database, suggested that he double check my voter registration before I go to vote in person. When he checked the database he saw that my voter registration address was out of date. Rather than being registered at my address in Goodyear I was still registered at my old address in Glendale.
6. Fortunately my colleague knew that I needed to go to the polling location for my new address in Goodyear. He was able to help me locate the correct polling location and I was able to cast a provisional ballot.
7. Because I was a first time voter and not familiar with the provisional ballot procedures, without my colleague’s help I likely would have gone to the polling location

that matched my out of date voter registration address. I now know that had I gone there and cast a provisional ballot my vote would not have been counted.

8. Even if I had incorrectly gone to the polling location in Glendale, then been informed by the poll worker in Glendale that I needed to go to the polling location for my address in Goodyear, and successfully found the address for that polling place, I would then still have had to drive approximately 20 miles to reach the polling place for my correct address in Glendale.

9. Because my voter registration address was not updated after I reported my new address to MVD, I did not receive any mailings or other information from election officials informing me about upcoming elections or where to go to vote.

10. I am a member of the League of Women Voters of Arizona. I have worked with the League as a part of my work on criminal justice reform.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 05, 2018.

Karen Kuhlman